UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS BROWNSVILLE DIVISION

STATE OF TEXAS, et al.)
Plaintiffs,)) No. 1:14-cy-254
v.)
UNITED STATES OF AMERICA, et al.)
Defendants.)
	_)

UNOPPOSED MOTION TO FILE EXCESS PAGES

Defendants hereby move, unopposed, for leave to exceed the 20-page limit for their opposition to Plaintiffs' Motion for Preliminary Injunction (ECF No. 5), and to file a brief up to and including 55 pages. The requested extension of pages is warranted and necessary to allow Defendants to respond to Plaintiffs' brief, which was itself 33 pages, as well as to address the additional serious jurisdictional issues presented by this action.

Dated: December 24, 2014 Respectfully submitted,

KENNETH MAGIDSON

JOYCE R. BRANDA

Acting Assistant Attan

United States Attorney Acting Assistant Attorney General

DANIEL DAVID HU

Assistant United States Attorney
Deputy Chief, Civil Division

KATHLEEN R. HARTNETT
Deputy Assistant Attorney General

DIANE KELLEHER
Assistant Branch Director,
Federal Programs Branch

/s/ Kyle R. Freeny

KYLE R. FREENY (Cal. Bar No. 247857)

Attorney-in-Charge

Civil Division, Federal Programs Branch

U.S. Department of Justice

P.O. Box 883

Case 1:14-cv-00254 Document 37 Filed on 12/24/14 in TXSD Page 2 of 4

Washington, D.C. 20044 Tel.: (202) 514-5108 Fax: (202) 616-8470 Kyle.Freeny@usdoj.gov

Attorneys for Defendants

CERTIFICATE OF CONFERRAL

Pursuant to Local Civil Rule 7.1.D, undersigned counsel hereby certifies that on the morning of December 19, 2014, she contacted counsel for Plaintiffs, Arthur C. D'Andrea, for Plaintiffs' position on the foregoing Motion to File Excess Pages, who indicated that Plaintiffs do not oppose the relief sought in this Motion.

/s/ Kyle R. Freeny
Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion to File Excess Pages has been delivered electronically on December 24, 2014, to counsel for Plaintiffs via the District's ECF system.

/s/ Kyle R. Freeny
Counsel for Defendants